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July 12, 1999

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Ms. Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: SBC-Ameritech Merger, Docket No. 98-141

Dear Ms. Salas:

I write, on behalf of the National Council of La Raza (NCLR), to express our views on the proposed SBC-Ameritech merger. As you may know, NCLR is the nation's largest Hispanic organization, representing more than 220 affiliates in 34 states, Puerto Rico, and the District of Columbia who together provide a range of services to more than two million Latinos and other Americans each year. In addition to supporting and assisting the work of its affiliates, NCLR serves as a voice for Hispanic Americans on a broad range of public policy issues. Hispanic Americans, and NCLR, have a deep and vital interest in maximizing access to telecommunications services, and in assuring that telecommunications companies maintain and expand the industry's commitment to sound corporate responsibility practices.

As a general rule, NCLR has not taken positions on the various telecommunications and financial industry mergers that have taken place in recent years. Our existing policy, as approved by the NCLR Board of Directors, authorizes the staff to raise questions about and to engage in discussions regarding the civil rights implications of regulated industries. Thus, NCLR previously has called for maintenance of universal access to services, expanded philanthropic efforts, and similar issues in the context of telecommunications mergers, and maintenance of Community Reinvestment Act and related protections, and increased access to capital in the context of financial industry mergers. In this connection, we previously have filed comments with appropriate regulatory bodies, and have engaged in direct discussions with the parties in various proposed telecommunications and financial industry mergers, sometimes as a member of broader coalitions of civil rights organizations.

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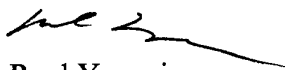
LA RAZA: The Hispanic People of the New World

These comments represent NCLR's only formal action with respect to the proposed SBC-Ameritech merger. However, we note that in the SBC-Pacific Bell merger, NCLR filed comments with the California Public Utilities Commission, and participated in discussions with both parties. In part as a result of this filing and subsequent discussions SBC agreed to a number of conditions, including certain actions to promote universal access to telecommunications services in California, and the establishment of an independent, philanthropic fund to promote the interests of low-income, under-served communities. As implementation of these agreements has proceeded, we have found that SBC has fully lived up to, and in some cases will exceed, the understandings reached during our discussions.

We have reviewed the package of proposed conditions that SBC and Ameritech submitted to the Commission in connection with their merger application. Although we do not claim substantial expertise with many of the issues addressed by the package, we find nothing in the submission that appears to be inconsistent with the interests of Hispanic Americans. Indeed, the commitments to improving universal assistance services, a future plan for assuring equitable treatment of low-income areas with respect to advanced services, and the enhanced reporting and disclosure provisions appear to go well beyond those required by the Commission of previous merger partners. More importantly, based on its record in meeting and exceeding its commitments, we have every reason to expect that the post-merger SBC will fulfill the letter and spirit of the conditions and understandings reached with the Commission.

We congratulate the parties, Chairman Kennard, and the Commission staff for bringing this innovative process to a successful resolution.

Sincerely,



Raul Yzaguirre  
President

cc: Service Lists for SBC-Ameritech merger